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Attorneys for Specialized Loan Servicing LLC as servicer for Deutsche Bank National Trust Company, as Trustee for HSI Asset Securitization Corporation Trust 2007-NC1, Mortgage Pass-Through Certificates, Series 2007- NC1

IN THE MATTER OF:

Veronica C. Radgman

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-19778 MBK

NOTICE OF OBJECTION

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Specialized Loan Servicing LLC as servicer for Deutsche Bank National Trust Company, as Trustee for HSI Asset Securitization Corporation Trust 2007-NC1, Mortgage Pass-Through Certificates, Series 2007- NC1**, the holder of a Mortgage on the debtors' premises at **702 Wakefield Road, Neptune, NJ, 07753** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On May 31, 2018, Secured Creditor filed a secured proof of claim for pre-petition arrears in the amount of \$39,010.38 and an annual interest rate of 3.125000%.
2. Debtor's plan provides for payment in the amount of 36,000.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$3,010.38, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire

Attorney for Specialized Loan Servicing LLC as servicer for

Deutsche Bank National Trust Company, as Trustee for HSI

Asset Securitization Corporation Trust 2007-NC1, Mortgage

Pass-Through Certificates, Series 2007- NC1

Dated: JUNE 6, 2018